



REPLY TO ATTENTION OF:

DEPARTMENT OF THE ARMY  
BALTIMORE DISTRICT, CORPS OF ENGINEERS  
P.O. BOX 1715  
BALTIMORE, MARYLAND 21203-1715



SEMS DocID

2339944

PLG-1A

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(Red)

January 13, 1992

Project Management  
Division

Ms. Sue Whittington  
Project Manager  
EPA  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

PA-2718

Dear Ms. Whittington:

This refers to the Valley Forge General Hospital (VFGH) project at Phoenixville, PA, and Technical Review Committee (TRC) established for the VFGH project.

Enclosed is an announcement and agenda for the TRC meeting and the agenda for the public meeting for your information. As important members of this project committee, your attendance is requested. If you have any questions or revisions to the agenda, please call Mr. H. Glenn Earhart at (410) 962-2342.

Sincerely,

Charles M. Hess, P.E.  
Deputy District Engineer  
for Project Management

Enclosures

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VALLEY FORGE GENERAL HOSPITAL (VFGH), PHOENIXVILLE, PA  
TECHNICAL REVIEW COMMITTEE MEETING ANNOUNCEMENT

MEETING: TECHNICAL REVIEW COMMITTEE - VFGH

TIME: FEBRUARY 6, 1992, at 10:30 AM

PLACE: VALLEY FORGE CHRISTIAN COLLEGE  
OPERATIONS DIVISION CONFERENCE ROOM  
BUILDING 70

PHOENIXVILLE, PA 19460

POC: WILLIAM WERKHEISER 215-935-0450

PURPOSE: TO REVIEW PROJECT STATUS IN PREPARATION FOR CORPS  
OF ENGINEERS SECOND QUARTERLY PROJECT STATUS REVIEW.  
A PUBLIC MEETING IS SCHEDULED FOR FEBRUARY 6, 1992,  
AT 7:00 PM IN THE PHOENIXVILLE HIGH SCHOOL LIBRARY.

ATTACHMENT: AGENDA AND MAP

POC: H. GLENN EARHART - CORPS OF ENGINEERS - 410-962-2342  
800-242-8350

ENCL 1'

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VALLEY FORGE GENERAL HOSPITAL,  
PHOENIXVILLE, PA

TRC MEETING AGENDA

VALLEY FORGE CHRISTIAN COLLEGE

FEBRUARY 6, 1992, 10:30 AM

Removal Actions

Scope  
Schedule  
Cost

Remedial Investigation/Feasibility Report (RI/FS)

Scope  
Schedule  
Cost

Public Involvement Plan (PIRP)

Hot Line Status Report  
Repositories  
Media/Congressional/Legislators  
PIRP Milestones

Current Actions

Technical Review Committee Meeting Report  
Workplan Review - Woodward & Clyde  
Risk Assessment of Recreational Areas - Army EHA

Future Actions

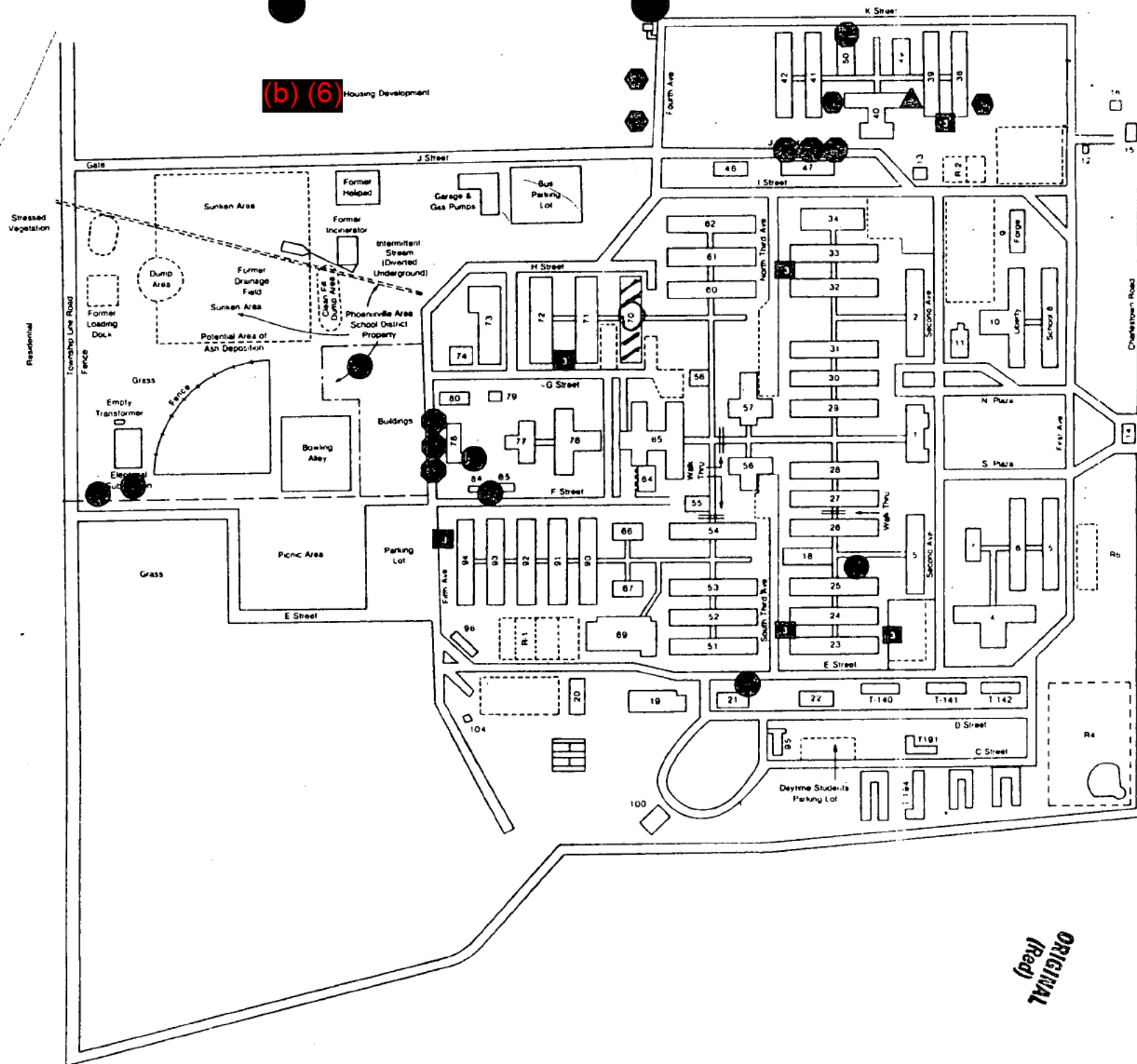
Monthly Sampling Schedule  
Future Milestones

ENCL 1<sup>2</sup>

- ▲ Drums
- Transformers
- Capacitors (18)
- Storage Tanks (7) (AST)
- UST (7)

(b) (6) Housing Development

- 1- Administration Bldg
- 2- Women's Dorm
- 4- Women's Dorm
- 6- Women's Dorm
- 11- Memorial Chapel
- 14- Gate House, Entrance
- 18- Classrooms 5, 6, 7
- 20- Theater
- 23- Faculty Apts.
- 24- Guest House
- Men's Dorms
- 26- Faculty Offices
- 27- Library Storage
- 28- Library
- 32- Married Students' Apts.
- 33- Married Students' Apts
- 40- Maintenance Shops
- 54- Music Bldg
- 55- Classrooms 3 & 4
- 56- Classrooms 1 & 2
- Bookstore
- 57- Chapel
- 58- Laundry
- 62- Married Students' Apts.
- 63- Cafeteria
- 66- Mailroom
- Classroom 12
- 69- Gymnasium
- 70- Maintenance
- 76- Band Hall
- Classrooms 8, 9, 10, 11
- 77- Student Center
- 91- Men's Dorm
- 92- Men's Dorm
- 94- Men's Dorm
- R1- Tennis Courts
- R2- Tennis Courts
- R3- Picnic Area
- Miniature Golf
- R4- Softball Field
- R6- Soccer Field
- R103- Bowling Lanes



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SECOND PUBLIC PROJECT STATUS REPORT  
VALLEY FORGE GENERAL HOSPITAL, PHOENIXVILLE, PA

MEETING AGENDA

PHOENIXVILLE HIGH SCHOOL LIBRARY

February 6, 1992

7:00 P.M.	Welcome	Ted Ryan Schuylkill Township Supervisor
7:05 P.M.	Purpose	Richard E. Basye, P.E. LTC, Corps of Engineers, Baltimore District Deputy District Engineer
7:10 P.M.	Status Report	Glenn Earhart Project Manager Baltimore District U. S. Army Corps of Engineers
	Removal Actions	
	Scope	
	Schedule	
	Cost	
	Remedial Investigation/Feasibility Report (RI/FS)	
	Scope	
	Schedule	
	Cost	
	Public Involvement Plan (PIRP)	
	Hot Line Status Report	
	Repositories	
	Media/Congressional/Legislators	
	PIRP Milestones	
	Current Actions	
	Technical Review Committee Meeting Report	
	Workplan Review - Woodward & Clyde	
	Risk Assessment of Recreational Areas - Army EHA	
	Future Actions	
	Monthly Sampling Schedule	
	Future Milestones	
8:00 P.M.	Question and Answer/Comment Period	
9:30 P.M.	Adjournment	

ENCLOSURE 2

# MEMORANDUM

January 10, 1992

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TO: Distribution

FROM: Glenn Earhart *HGE*  
U.S. Army Corps of Engineers, Baltimore District

SUBJECT: Minutes of December 10, 1991 Valley Forge General Hospital RI/FS Chemical Data Acquisition Plan Design Review Meeting.

The meeting was opened by Mr. Glenn Earhart of the U.S. Army Corps of Engineers (USACE), Baltimore District. Mr. Earhart made introductions (see Attachment 1 for a list of persons in attendance at the meeting) and thanked the Valley Forge Christian College for making their facilities available for this meeting. Mr. Earhart stated that the next public meeting regarding VFGH was tentatively scheduled for February 5, 1992. He then reviewed the meeting agenda and summarized the status and schedule for the removal action currently underway at the site. He then turned the meeting over to Woodward-Clyde Federal Services (WCFS) to make a presentation regarding the Draft Chemical Data Acquisition Plan (CDAP) for the Valley Forge General Hospital (VFGH) RI/FS.

**Not Responsive Due to Revised Scope** presented background information and rationale that WCFS used in developing the CDAP. They explained the objectives of the field program and how the work described in the CDAP would fulfill these objectives. The main objectives of the study are to establish what, if any, contaminants of concern resulting from U.S. Army former activities at the VFGH may exist onsite or in the adjacent land areas, what the concentrations are of these contaminants, what risk these contaminants may pose to the public, and what if any disposal/remedial action should be taken.

After WCFS's presentation, the Technical Review Committee Member's comments on the CDAP were reviewed and changes to the Draft CDAP were discussed. The following is a summary of this discussion:

## Chester County Comments

The comments submitted by Walter P. Leuchak, Chester County Public Health Engineer were discussed. The County will attempt to contact **(b) (9), (b) (6)** to see if they desire to have their wells sampled during the VFGH Field Investigation. It was decided not to add any additional sediment samples along the Northwestern Tributary to French Creek. The County was also informed that the wastewater collection system could not be evaluated and a monitoring well could not be installed at pump house #82, because these facilities have been beneficially used by the current land owners since the Army ceased operations at VFGH.

Baltimore District USACE Comments

The comments submitted by the Baltimore District USACE were discussed. The first major point of discussion concerned portions of the property that have been beneficially used by the current land owners since the Army ceased operations at VFGH. It was pointed out that under Federal Law contamination occurring from these areas could not be evaluated unless the activities by the current land owners were similar to those of the Army while it operated the VFGH. Based on this point the following resolutions were agreed to:

- o The rubble pile labeled as A-1 near the landfill will not be sampled since it was not present when the VFGH was closed in 1973.
- o The rubble pile near building T-194 will not be sampled since it was not present when VFGH was closed in 1973.
- o The Phoenixville School District's vehicle maintenance facility will be sampled since the Army also used this area for vehicle maintenance.
- o The boiler plants will still be sampled because they were used for the same purpose by the Army.

The following are additional changes that will be incorporated into the Final CDAP based on the discussion of the USACE's comments:

- o A glossary of acronyms will be included in the CDAP.
- o Additional road names will be added to appropriate figures in the report.
- o A soils map will be included in the report.
- o A description of the FUDS Program will be included in the report.
- o References will be added to the CDAP.
- o Information from the Draft Removal Action Report will be included as appropriate in the report.
- o The New England Division Lab will be used for the QA laboratory analyses.
- o Geophysical surveys will be conducted only in the vicinity of the landfill.

- o Disposal of contaminated water and soil from the field investigation activities will be closely coordinated between the USACE and PADER.
- o A location map for the wind roses will be added to the CDAP.

#### Green Valleys Association Comments

The comments submitted by (b) (6) were discussed. Several of the comments did not apply to the objectives and scope of the VFGH RI/FS. It was pointed out that questions regarding the Chester County Health Departments study of the six cases of Hodgkin's Disease would have to be taken up by the Health Department. It was also restated that the VFGH RI/FS is not an epidemiology study. The RI/FS will assess the contamination, if any, at the site that may have resulted from the Army's activities at VFGH. The study will also assess the risk, based on EPA guidelines, that any contamination may pose to the public.

It was also pointed out that the buildings inspection and inventory and removal of durms, underground storage tanks, transformers, and capacitors that are currently onsite were being completed under a different contract and is not part of the VFGH RI/FS. The following are resolutions to the comments that were germane to the CDAP for the VFGH RI/FS:

- o References will be added for the information regarding the historical mining activities that occurred in the Phoenixville area. The reference to mining in the CDAP was not intended to imply that mining activities took place onsite but rather that natural background levels of some chemicals (e.g. lead) may be higher than normal because of the geological makeup of the area.
- o As stated in the Draft CDAP, background (offsite) samples will be obtained for surficial soil, ground water, surface water, and sediments.
- o The results of the April 12, 1990 site assessment performed by Pennsylvania Department of Environmental Resources (PADER) will be taken into consideration for this project.
- o The no-further-action alternative in the Feasibility Study must be considered by Law.
- o Monitor wells will not be installed offsite. Offsite ground water samples will be obtained from existing residential water supply wells.
- o The residences of the persons with Hodgkin's Disease will not be shown on a map in the report.

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- o The pond directly west of the entrance to VFGH will not be sampled because there are sufficient background samples being obtained from other offsite ponds in this area west of the project site.
- o Documents regarding the VFGH RI/FS should be available at the repository in the local library. If persons are having difficulties in obtaining copies of reports, they should contact Mr. Glenn Earhart, USACE Program Manager for the VFGH RI/FS at (410) 962-2342.

#### USAEHA Comments

USAEHA's comments were basically centered over a few primary issues. These issues were discussed in detail and the following resolutions were agreed to:

##### Number of Samples:

The sampling pattern used for this field investigation is judgmental sampling. The number of samples being obtained will not allow for determination of statistical variability of concentrations. However, it is believed that the designed locations for the judgmental samples will reveal the highest concentration of contaminants if any are present. This will result in a conservative (highest risk) risk assessment. It may be necessary to conduct additional field investigations to provide better estimates of reasonable maximum exposure levels; however, for the initial field investigation, judgmental sampling is the most cost effective method. Consequently, the number of samples presented in the draft CDAP will not be changed.

##### Fenceline Samples:

After considerable discussion, it was decided to retain the fenceline samples in the field investigation. The decision to retain the samples was based on WCFSs past experience on similar sites, evidence of children crawling under the fence to gain access to the site, and the desire of the Chester County Health Department to have the fencelines tested for pesticides/herbicides. It was noted that for the risk assessment, exposure times would be limited to the time it would take a person (e.g. a child) to crawl under the fence to gain access to the site.

##### Incinerator Samples:

Based on the design of the incinerator and field inspection, it was concluded that the training activities of the local fire department would not adversely affect ash and soot residues in the incinerator smoke stack and would not alter the value of the information for the RI/FS report. Additionally, samples of the smoke stack would provide some information that would be necessary for demolition of the

incinerator and disposal of the debris. Consequently, it was decided to retain the sampling for the incinerator smoke stack.

#### Risk Assessment Outline:

It was noted that exposure scenarios were inadvertently omitted from the Draft CDAP. Woodward-Clyde presented the exposure scenarios upon which the field investigation was based. These exposure scenarios will be included in the Final CDAP.

#### Trenching:

After considerable discussion, it was decided that trenching could pose a hazard and should not be done. PADER indicated that the material in the landfill would need to be characterized, however, before it could approve any remediation plan. Consequently, it was decided that soil borings in the landfill would be used to characterize the material. The borings will be continuously sampled in the landfill material and the samples will be composited on a weight basis for laboratory analysis. PADER and USACE representatives stated that this would be acceptable.

#### Soil Boring Sampling:

It was decided that samples will be taken at predetermined depths (e.g. 5 feet and 10 feet) as opposed to selecting samples based on OVA screening. Using consistent depths for sampling between borings will simplify the risk analysis.

#### Dioxin Analyses:

It was discussed whether or not samples had to be analyzed for all of the dioxin congeners. It was mentioned that nearly all of the samples in which dioxin was detected contained only the hepta and the octa congeners. WCFS pointed out that in the IT investigation, all congeners and some Furans were detected in the incinerator. Mr. Glenn Earhart indicated that the USACE and WCFS would research this issue further and that the USACE would make a decision on the level of dioxin analyses at a later date.

#### PADER's Comments

PADER indicated that it would be submitting its written comments regarding the Draft CDAP in the near future. It reiterated that the material in the landfill would need to be characterized before PADER would approve any remediation action. Additionally, PADER stated that it develops ARARs on a site specific basis and that they do not have general requirements for these types of sites.

Non Response based on Revised Scope

Comments

Ms. [REDACTED] was not in attendance at the meeting but her comments were discussed by the rest of the Technical Review Committee. It was pointed out that published literature indicated that temperatures of 2000°F could have been attained in the incinerator. The USACE will send Ms. [REDACTED] a copy of the Removal Action Report to answer her questions regarding the underground storage tanks. WCFS will call Ms. [REDACTED] to explain the use of trip and field blanks in the field investigation. Mr. Earhart also recommended that WCFS send Ms. [REDACTED] a copy of the USACE's ER-273 on Field Procedures.

No additional comments were raised and Mr. Earhart adjourned the meeting.

## ATTACHMENT

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## CDAP TECHNICAL REVIEW COMMITTEE MEETING ATTENDANCE SHEET

NAME	REPRESENTING	TELEPHONE NUMBER
Not Responsive Due to Revised Scope	WCFS	Not Responsive Due to Revised Scope
Glenn Earhart	USACE	410-962-2342
Keith Hoddinott	USAEHA	410-671-2953
Joe Schaefer	USACE	410-962-2179
Gordon L. McCabb	VFCC	935-0450 ext.215
Not Responsive Due to Revised Scope	WCFS	Not Responsive Due to Revised Scope
Not Responsive Due to Revised Scope	WCFS	Not Responsive Due to Revised Scope
Pasqualino Capeci, Jr.	VFCC	215-935-0450
William J. Werkheiser	VFCC	215-935-0450
Christopher Falkler	PADER	215-832-6212
Walter P. Leuchak	CCHD	215-344-6246
Dr. Harold Russell	CCHD	215-344-6258
Tina Stonorov Daly	Green Valleys Assoc.	215-983-0874
Thomas H. Tracy	CCHD	215-344-6224
Gary Bonner	PADER	215-832-6212
Mark L. Johnson	PADER	215-832-6050
Olga Kerkales	Schuylkill Twp. Open Space Comm., Schuylkill Twp. Civic Assoc., Green Valleys Assoc.	215-935-0460
Ted Ryan	Schuylkill Twp.	215-933-5843
Herman Joya	Schuylkill Twp.	215-933-5843